

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**TRINET USA, INC.**

**Plaintiff,**

**vs.**

**VENSURE EMPLOYER  
SERVICES, INC.,**

**Defendant.**

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**CASE NO. \_\_\_\_\_**

Arising from Case No. 8:20-  
cv-02018, pending in the  
United States District Court  
for the Middle District of  
Florida

**MOTION TO ENFORCE RULE 45 SUBPOENA**

Pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i) and Local Rule 7.1, Petitioner TriNet USA, Inc. (“Petitioner”) hereby moves this Court to compel nonparties Chuck Link and Phil Urso (collectively the “Vensure Employees”) to comply with the subpoenas (“Subpoenas”) that Petitioner served on the Vensure Employees in the underlying action captioned *TriNet USA, Inc. v. Vensure Employer Services, Inc.*, Case No. 8:20-cv-02018 (M.D. Fla.) (the “Underlying Action”).

For the reasons set forth in its Memorandum in Support of Motion to Enforce Rule 45 Subpoena, Petitioner respectfully moves this Court to enter an Order compelling the Vensure Employees to comply with the Subpoenas, produce all non-privileged documents responsive to the Subpoenas within ten days of the Order, and

require the Vensure Employees to certify to this Court that they have complied with the Court's Order.

Respectfully submitted this the 20<sup>th</sup> day of April, 2021.

/s/ Steven J. Rosenwasser

Steven J. Rosenwasser

rosenwassers@gtlaw.com

James Z. Foster

fosterja@gtlaw.com

**GREENBERG TRAURIG, LLP**

Terminus 200

3333 Piedmont Road NE

Suite 2500

Atlanta, GA 30305

Telephone: (678) 553-2100

Facsimile: (678) 553-2212

*Attorneys for TriNet USA, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 20, 2021, I electronically filed the foregoing MOTION TO ENFORCE RULE 45 SUBPOENA with the Clerk of Court using the CM/ECF system and served the following via electronic mail and overnight mail:

Patrick Cory Barnwell  
Barnwell Law Group, P.C.  
2425 Commerce Ave. NW., Suite 300  
Duluth, GA 30096

/s/ Steven J. Rosenwasser

Steven J. Rosenwasser